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19BA-CV03467 - L. G. V COLUMBIA PUBLIC SCHOOLS ET AL (E-CASE)

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- 08/26/2019

☐ [Note to Clerk eFiling](#)
(ms)
Filed By: JOHN ANDREW HIRTH

☐ [Notice](#)
Notice of Filing. (ms)
Filed By: JOHN ANDREW HIRTH
On Behalf Of: L. G., M. G.
- 08/21/2019

☐ [Summons Issued-Circuit](#)
Document ID: 19-SMCC-917, for CITY OF COLUMBIA, MISSOURI. Attorneys are to print two copies of summons and issue for service. (ms)

☐ [Summons Issued-Circuit](#)
Document ID: 19-SMCC-916, for EDWARDS, KEISHA. Attorneys are to print two copies of summons and issue for service. (ms)

☐ [Summons Issued-Circuit](#)
Document ID: 19-SMCC-915, for BAKER, TIM. Attorneys are to print two copies of summons and issue for service. (ms)

☐ [Summons Issued-Circuit](#)
Document ID: 19-SMCC-914, for COLUMBIA PUBLIC SCHOOL DISTRICT. Attorneys are to print two copies of summons and issue for service. (ms)

☐ [Order Appt Next of Friend](#)
Order Appointing Next of Friend signed this date. (ms)
- 08/20/2019

☐ [Confid Filing Info Sheet Filed](#)
(ms)
Filed By: JOHN ANDREW HIRTH

☐ [Pet Filed in Circuit Ct](#)
Petition for Damages and Injunctive Relief. (ms)
Filed By: JOHN ANDREW HIRTH
On Behalf Of: L. G., M. G.

☐ [Proposed Order Filed](#)
Proposed Order Appointing Next Friend. (ms)
Filed By: JOHN ANDREW HIRTH

☐ [Motion to Appoint Next Friend](#)
Petition for Appointment of Next Friend. (ms)

☐ [Judge Assigned](#)

IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI

L.G., through her parent and Next Friend, M.G,

Plaintiff,

v.

Case No. _____

COLUMBIA PUBLIC SCHOOLS,

**Serve: 1818 W. Worley St.
Columbia, MO 65203**

TIM BAKER, individually,
and as Assistant Principal of Rock Bridge
High School,

**Serve: 4303 S Providence Rd
Columbia, MO 65203**

CITY OF COLUMBIA, MISSOURI,

**Serve: 701 E Broadway
Columbia, MO 65205**

KEISHA EDWARDS, individually,
and as a police resource officer at Rock Bridge
High School

**Serve: 4303 S Providence Rd
Columbia, MO 65203**

and

JOHN DOES I and II, individually, and as Police
Officers for the City of Columbia,

Defendants.

JURY TRIAL DEMANDED

PETITION FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff L.G., a minor, through her parent and proposed Next Friend, M.G.,¹ states the following for her Petition for Damages and Injunctive Relief:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff L.G. was, at all times relevant to this action, a resident of Boone County, Missouri and a student at Rock Bridge High School in Columbia, Missouri.

2. Defendant Columbia Public Schools (“CPS”) is a public-school district existing under the laws of the State of Missouri and operating in Boone County, Missouri.

3. Defendant Tim Baker was, at all times relevant to this action, the assistant principal (“AP”) of Rock Bridge High School.

4. Defendant Keisha Edwards was, at all times relevant to this action, the School Resource Officer (“SRO”) at Rock Bridge High School.

5. Defendant City of Columbia is a municipal corporation and charter city established pursuant to the constitution and laws of the State of Missouri.

6. Defendants John Doe I and II were, at all times relevant to this action, employed as police officers by the City of Columbia.

7. This Court has subject matter jurisdiction over Plaintiff’s claims pursuant to Article VI, section 14 of the Missouri Constitution.

8. Venue is proper in this Court because the wrongful conduct alleged herein occurred in Boone County, Missouri.

¹ M.G. has concurrently filed a petition for appointment as Next Friend to L.G.

GENERAL ALLEGATIONS RELEVANT TO ALL COUNTS

9. L.G. is a sixteen-year-old, straight-A student at Rock Bridge High School in Columbia, Missouri.
10. L.G. has general anxiety disorder (GAD), obsessive compulsive disorder (OCD), and clinical depression resulting from the GAD and OCD, for which she is treated by counselors both in and out of the school.
11. On the afternoon of May 22, 2019, Columbia Police Officers John Doe I and II came to Rock Bridge High School to question L.G. about a sexual assault that allegedly occurred at the house of a CPS student with the same first name as L.G.
12. L.G. was summoned to the office during her geometry final exam, but her teacher asked for her to be allowed to finish the test before coming to the office.
13. Immediately after her geometry final, L.G. was scheduled to finish a final project in her accounting class and then take her final exam in human anatomy.
14. In the break between geometry and accounting, L.G. went to the office as requested.
15. When L.G. reached the office, SRO Edwards informed L.G. that the police were there to question her.
16. SRO Edwards then took L.G. into a room with Officers John Doe I and II.
17. On the way into the room, AP Baker asked SRO Edwards if he was needed but she said no.
18. Once L.G. was inside the room, SRO Edwards left her alone with Officers John Doe I and II and closed the door.
19. CPS Policy G, which governs student interactions with law enforcement at school, provides as follows:

The Columbia School District No. 93 has legal jurisdiction over students during the school day and hours of approved extracurricular

activities. The school administration is responsible for making an effort to protect each student's rights with respect to intervention by law enforcement officials. If a student is a witness to or victim of a crime or a dangerous situation, the name of the student and the information gathered by school officials will be turned over to the local law enforcement to assist in protecting the welfare of all students. ***When law enforcement officials find it necessary to question students during the school day or periods of extra-curricular activities, the school principal or designee will be present and the interview will be conducted in private.***

(Emphasis added).

20. Contrary CPS Policy G, neither AP Baker nor another designee of the principal was present while L.G. was questioned by Officers John Doe I and II.

21. No one from CPS notified L.G.'s parents that the police were questioning her.

22. While she was being questioned by Officers John Doe I and II, L.G. did not believe she was free to leave the room.

23. A reasonable student in L.G.'s position would not have believed she was free to leave the room while being questioned by the police.

24. With the assistance of SRO Edwards, John Doe I and II seized and interrogated L.G. without a warrant, probable cause, exigent circumstances, or parental consent.

25. Officers John Doe I and II asked L.G. about another student, who will be referred to in this petition as Mary Doe.

26. L.G. told Officers John Doe I and II that although she was generally aware of a student named Mary Doe, L.G. did not know her personally and did not know if that was the same Mary Doe the police were asking about.

27. Officers John Doe I and II appeared incredulous of L.G.'s statement and pressed her for information.

28. L.G. asked the officers if there had been a mix up because she knew nothing about any alleged assault.

29. L.G. became increasingly distraught during the interrogation and started to shake.

30. The interrogation lasted for ten to twenty minutes before Officers John Doe I and II told L.G. she could leave.

31. Visibly shaken, L.G. called her mother, M.G., in near panic.

32. This was the first time M.G. learned that her daughter had been questioned by the police and she immediately drove to Rock Bridge High School to see her.

33. SRO Edwards explained to M.G. and L.G. that the police had questioned L.G. because they thought she had information about a sexual assault that had taken place over the prior weekend at the house of a student with the same first name as L.G.

34. After speaking with SRO Edwards, M.G. insisted on seeing L.G.'s counselor, Gretchen Cleppe, who was familiar with L.G.'s struggle with OCD and GAD.

35. Counselor Cleppe was very surprised to learn what had happened and immediately called AP Baker, who then met with L.G. and M.G.

36. AP Baker told M.G. and L.G. that he had seen SRO Edwards taking L.G. to be questioned by police and had asked her if she needed anything but SRO Edwards had said no.

37. After the conversations between L.G., M.G., SRE Edwards, Counselor Cleppe and AP Baker, L.G. had missed her accounting class and was too traumatized to take her anatomy final.

38. L.G. had to finish her accounting project over the weekend and come back to take the anatomy final the following Tuesday when all other students had already been released for the summer.

39. L.G., who is ordinarily a straight-A student, performed poorly on both her accounting project and her anatomy final due to the extreme anxiety caused by her interrogation and interrogation by Officers John Doe I and II.

40. L.G.'s mental health has deteriorated since her seizure and interrogation, and she is undergoing additional counseling.

41. L.G. seeks compensatory and punitive damages from Defendants for her injuries as well as injunctive relief to prevent Defendants from subjecting other students to unconstitutional seizure and interrogation without parental consent or adult accompaniment.

COUNT I—UNCONSTITUTIONAL SEIZURE

42 U.S.C. § 1983

(Against Defendants Keisha Edwards, John Doe I, and Joe Doe II)

42. Plaintiff incorporates by reference all paragraphs of this Petition as if fully set forth herein.

43. Under color of state law, SRO Edwards and Officers John Doe I and II seized L.G. without a warrant, probable cause, or exigent circumstances and interrogated her without the presence of a parent or another adult guardian.

44. L.G. did not believe she was free to leave during her interrogation.

45. SRO Edwards and Officers John Doe I and II's seizure of L.G. without a warrant, probable cause, or exigent circumstances and her custodial interrogation without the presence of a parent or adult guardian violated the Fourth and Fourteenth Amendments to the Constitution of the United States.

46. SRO Edwards and Officers John Doe I and II had actual knowledge of L.G.'s constitutional rights but consciously disregarded them when seizing L.G. without a warrant, probable cause, or exigent circumstances and interrogating her without the presence of a parent or adult guardian.

47. SRO Edwards's and Officers John Doe I and II's violation of L.G.'s constitutional rights caused her injury in the form of extreme emotional distress requiring medical treatment and ongoing therapy.

48. SRO Edwards and Officers John Doe I and II's actions were the direct and proximate cause of L.G.'s injuries.

49. SRO Edwards and Officers John Doe I and II are not entitled to qualified immunity because L.G.'s constitutional right against unwarranted seizure without probable cause or exigent circumstances was clearly established at the time of her custodial interrogation.

50. SRO Edwards's and Officers John Doe I and II's actions were outrageous in their reckless disregard of L.G.'s constitutional rights, entitling L.G. to an award of punitive damages in an amount that will punish these defendants and deter them and others from like conduct in the future.

51. Plaintiff is entitled to reasonable attorney's fees pursuant to 42 U.S.C. § 1988.s

COUNT II—UNCONSTITUTIONAL CUSTOM OR PRACTICE

42 U.S.C. § 1983
(Against the City of Columbia)

52. Plaintiff incorporates by reference all paragraphs of this Petition as if fully set forth herein.

53. The Columbia Police Department ("CPD") has a custom or practice of seizing minors without a warrant, probable cause, or exigent circumstances and interrogating them without the presence of a parent or adult guardian in violation of the Fourth and Fourteenth Amendments.

54. In conformity with CPD custom and practice, SRO Edwards and John Doe I and II seized L.G. without a warrant, probable cause or exigent circumstances and interrogated her without the presence of a parent or adult guardian.

55. The CPD's unconstitutional custom or practice of seizing minor CPS students without a warrant, probable cause or exigent circumstances and interrogating them without the presence of a parent or adult guardian directly and proximately caused L.G. injury in the form of extreme emotional distress requiring medical treatment and ongoing therapy.

56. Plaintiff is entitled to reasonable attorney's fees pursuant to 42 U.S.C. § 1988.s

COUNT III—NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

(Against Tim Baker and Keisha Edwards)

57. Plaintiff incorporates by reference all paragraphs of this Petition as if fully set forth herein.

58. CPS "has legal jurisdiction over students during the school day and hours of approved extracurricular activities." CPS Board Policy G.

59. Under Board Policy G, "When law enforcement officials find it necessary to question students during the school day or periods of extra-curricular activities, the school principal or designee will be present and the interview will be conducted in private."

60. AP Baker witnessed SRO Edwards taking L.G. into a room with Officers John Doe I and II for questioning.

61. AP Baker and SRO Edwards had a duty of reasonable care toward L.G.

62. AP Baker and SRO Edwards also had a ministerial duty under CPS Board Policy G to ensure that a principal or her designee was present when L.G. was interrogated by Officers John Doe I and II.

63. AP Baker and SRO Edwards breached their duty of reasonable care and Board Policy G by failing to ensure that L.G. was accompanied by a principal or principal's designee during her interrogation by Officers John Doe I and II.

64. AP Baker's and SRO Edwards's breach of their duties to L.G. directly and proximately caused L.G. injury in the form of extreme emotional distress requiring medical treatment and ongoing therapy.

65. AP Baker and SRO Edwards knew or should have known their failure to ensure that L.G. was accompanied by a principal or principal's designee during her interrogation by Officers John Doe I and John Doe II would cause L.G. injury.

66. L.G.'s emotional distress is medically diagnosable and of sufficient severity to require medical treatment.

67. Defendants Baker and Edwards are not entitled to official immunity because their duty to ensure that L.G. was accompanied by a principal or principal's designee during her interrogation was mandated by board policy, and their failure to do so was not an exercise of discretion.

WHEREFORE, Plaintiff L.G. prays for judgment in her favor and against Defendants individually and in their official capacities, awarding the following relief:

- (1) Compensatory damages for L.G.'s extreme and medically diagnosed emotional distress;
- (2) Punitive damages in an amount calculated to punish Defendants and to deter them and others from like conduct in the future;
- (3) Injunctive relief prohibiting the Columbia Police Department and Officers Edwards and John Does I and II from seizing CPS students at school and interrogating them without a warrant, probable cause, exigent circumstances, or parental/adult accompaniment;
- (4) Injunctive relief requiring CPS to notify parents immediately if their children are being questioned by police and to have an adult accompany the student during his or her interrogation;
- (5) Reasonable attorneys' fees for Counts I and II; and
- (6) Such other relief as the Court deems just and proper.

Respectfully submitted,

TGH Litigation LLC

/s/ J. Andrew Hirth
 J. Andrew Hirth
 Missouri Bar No. 57807
 28 N. Eighth St., Suite 500
 Columbia, MO 65201
 Andy@TGHLitigation.com

Phone: 573 256 2850
Fax: 573 213 2201

Attorneys for Plaintiff

**IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI**

L.G., a minor, through her natural parent and
proposed Next Friend M.G.,

Plaintiff,

vs.

COLUMBIA PUBLIC SCHOOLS,

TIM BAKER, individually, and in his official
capacity as Assistant Principal of Rock Bridge
High School,

CITY OF COLUMBIA, MISSOURI,

KEISHA EDWARDS, individually,
and as resource officer of Rock Bridge
High School,

and

JOHN DOES I and II, individually, and in their
Official capacities as police officers with the
Columbia Police Department,

Defendants.

Case No. _____

JURY TRIAL DEMANDED

PETITION FOR APPOINTMENT OF NEXT FRIEND

Movant M.G., natural mother and proposed Next Friend to minor Plaintiff L.G., states the following for her petition for appointment as next friend:

- 1) Minor plaintiff L.G. is sixteen years old.
- 2) Minor L.G. has no legally appointed guardian and desires to commence an action in this Court against the Columbia Public Schools, Tim Baker, Keisha Edwards, the City of Columbia, and John Doe I and II for violating her civil rights.
- 3) Movant M.G. is L.G.'s mother.

- 4) Movant M.G. is over the age of eighteen and is qualified to act as Next Friend.
- 5) Minor L.G. and Movant M.G. reside together in Boone County.
- 6) Movant M.G., with whom Minor L.G. resides, has been given notice of this
Petition.
- 7) Movant hereby consents to act as Next Friend for Minor L.G. for the purpose of
instituting the above-mentioned suit.

WHEREFORE, Movant requests that the Court grant this Petition for Appointment of Next Friend and such other relief as this Court deems just and proper.

Respectfully submitted,

TGH Litigation LLC

/s/ J. Andrew Hirth

J. Andrew Hirth
Missouri Bar No. 57807
28 N. Eighth St., Suite 500
Columbia, MO 65201
Andy@TGHLitigation.com
Phone: 573 256 2850
Fax: 573 213 2201

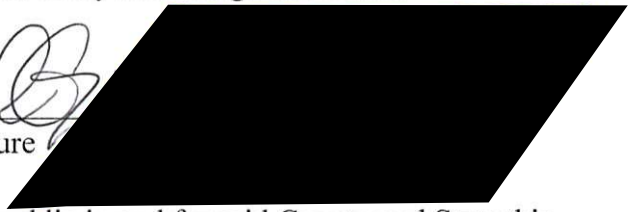
Attorneys for Plaintiff

VERIFICATION

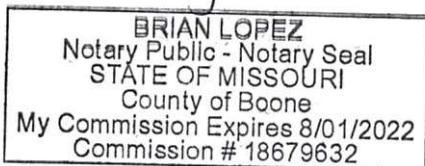
STATE OF MISSOURI)
) ss
COUNTY OF BOONE)


I, M.G., being of lawful age and duly sworn upon my oath, and with authority to execute this verification, state that I am the movant in the above Petition for Appointment of Next Friend and that the facts contained therein are true to the best of my knowledge and belief.


Signature



Subscribe to and sworn before me, a notary public in and for said County and State this
19th day of August, 2019.




Notary Public

My commission expires: 08/01/2022.

**IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI**

L.G., a minor, through her natural parent)
and proposed Next Friend M.G.,)

Plaintiff,)

vs.)

Case No. _____

COLUMBIA PUBLIC SCHOOLS,)

Defendants.)

ORDER

Upon consideration of the verified petition of movant M.G. for appointment as Next Friend to Plaintiff L.G., a minor over 14 years of age, said M.G. having consented to such appointment, the Court finds a next friend for L.G. is required. The Court further considers and finds that M.G. has consented to the appointment.

It is ORDERED that M.G. be and is hereby appointed next friend of L.G. pursuant to Rule 52.02(b) of the Missouri Rules of Civil Procedure for the purpose of commencing and prosecuting an action in this Court against the Columbia Public Schools, et al. for violating her civil rights.

Date

Judge/Clerk

**IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI**

L.G., a minor, through her natural parent)
and proposed Next Friend M.G.,)

Plaintiff,)

vs.)

Case No. _____

COLUMBIA PUBLIC SCHOOLS,)

Defendants.)

ORDER

Upon consideration of the verified petition of movant M.G. for appointment as Next Friend to Plaintiff L.G., a minor over 14 years of age, said M.G. having consented to such appointment, the Court finds a next friend for L.G. is required. The Court further considers and finds that M.G. has consented to the appointment.

It is ORDERED that M.G. be and is hereby appointed next friend of L.G. pursuant to Rule 52.02(b) of the Missouri Rules of Civil Procedure for the purpose of commencing and prosecuting an action in this Court against the Columbia Public Schools, et al. for violating her civil rights.

8/21/2019

Date

/s/ Christy Blakemore

~~XXXXXXXXXX~~

Circuit Clerk

COURT SEAL OF



BOONE COUNTY




IN THE 13TH JUDICIAL CIRCUIT, BOONE COUNTY, MISSOURI

Judge or Division: KEVIN M J CRANE	Case Number: 19BA-CV03467
Plaintiff/Petitioner: L. G.	Plaintiff's/Petitioner's Attorney/Address
vs.	
Defendant/Respondent: COLUMBIA PUBLIC SCHOOL DISTRICT	Court Address: 705 E Walnut COLUMBIA, MO 65201
Nature of Suit: CC Other Tort	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: KEISHA EDWARDS
Alias:
 4303 SOUTH PROVIDENCE ROAD
 COLUMBIA, MO 65203

COURT SEAL OF

BOONE COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

8/21/2019 **/s/ M. Stephens**
 Date Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
☐ other: _____

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

**ATTORNEY TO PAY BCSD
 DIRECTLY FOR SERVICE**

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 13TH JUDICIAL CIRCUIT, BOONE COUNTY, MISSOURI

Judge or Division: KEVIN M J CRANE	Case Number: 19BA-CV03467
Plaintiff/Petitioner: L. G.	Plaintiff's/Petitioner's Attorney/Address
vs.	
Defendant/Respondent: COLUMBIA PUBLIC SCHOOL DISTRICT	Court Address: 705 E Walnut COLUMBIA, MO 65201
Nature of Suit: CC Other Tort	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **TIM BAKER**

Alias:

4303 SOUTH PROVIDENCE ROAD
COLUMBIA, MO 65203

COURT SEAL OF



BOONE COUNTY

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8/21/2019

Date

/s/ M. Stephens

Clerk

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☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

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(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary
Supplemental Surcharge \$ 10.00
Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

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IN THE 13TH JUDICIAL CIRCUIT, BOONE COUNTY, MISSOURI

Judge or Division: KEVIN M J CRANE	Case Number: 19BA-CV03467
Plaintiff/Petitioner: L. G.	Plaintiff's/Petitioner's Attorney/Address
Defendant/Respondent: COLUMBIA PUBLIC SCHOOL DISTRICT	Court Address: 705 E Walnut COLUMBIA, MO 65201
Nature of Suit: CC Other Tort	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CITY OF COLUMBIA, MISSOURI
Alias:

701 E. BROADWAY
COLUMBIA, MO 65205

COURT SEAL OF



BOONE COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

8/21/2019

Date

/s/ M. Stephens

Clerk

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☐ other: _____

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary
Supplemental Surcharge \$ 10.00
Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

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IN THE 13TH JUDICIAL CIRCUIT, BOONE COUNTY, MISSOURI

Judge or Division: KEVIN M J CRANE	Case Number: 19BA-CV03467
Plaintiff/Petitioner: L. G.	Plaintiff's/Petitioner's Attorney/Address
vs.	
Defendant/Respondent: COLUMBIA PUBLIC SCHOOL DISTRICT	Court Address: 705 E Walnut COLUMBIA, MO 65201
Nature of Suit: CC Other Tort	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: COLUMBIA PUBLIC SCHOOL DISTRICT

Alias:

1818 W. WORLEY
COLUMBIA, MO 65203

COURT SEAL OF



BOONE COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

8/21/2019

Date

/s/ M. Stephens

Clerk

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Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

**ATTORNEY TO PAY BCSD
DIRECTLY FOR SERVICE**

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI**

L.G., a minor, through her natural parent)	
and proposed Next Friend M.G.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 19BA-CV03467
)	
COLUMBIA PUBLIC SCHOOLS,)	
)	
Defendants.)	

NOTICE OF FILING

Per the instruction of the Boone County Circuit Clerk's Office, Plaintiff hereby resubmits the filing fee for this action.

Respectfully submitted,

TGH Litigation LLC

/s/ J. Andrew Hirth
J. Andrew Hirth
Missouri Bar No. 57807
28 N. Eighth St., Suite 500
Columbia, MO 65201
Andy@TGPLitigation.com
Phone: 573 256 2850
Fax: 573 213 2201

Attorneys for Plaintiff

**IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI**

L.G., through her parent and Next Friend, M.G.)

Plaintiff,)

v.)

Case No. 19BA-CV03467

COLUMBIA PUBLIC SCHOOLS,)

**TIM BAKER, individually, and as Assistant
Principal of Rock Bridge High School,**)

CITY OF COLUMBIA, MISSOURI,)

**KEISHA EDWARDS, individually, and as
a police resource officer at Rock Bridge
High School,**)

and)

**JOHN DOES I and II, individually, and as
Police Officers for the City of Columbia**)

Defendants.)

ENTRY OF APPEARANCE

COMES NOW Natalie A. Hoernschemeyer of the law firm of Mickes O'Toole, LLC,
and hereby enters her appearance on behalf of Defendants Columbia Public Schools and Tim
Baker in the above-referenced case.

Respectfully submitted,

MICKES O'TOOLE, LLC

By: /s/ Natalie Hoernschemeyer

Natalie A. Hoernschemeyer, MBE #49692

natalie@mickesotoole.com

12444 Powerscourt Drive, Suite 400

St. Louis, Missouri 63131

Telephone: 314-878-5600

Facsimile: 314-878-5607

*Attorney for Defendants Columbia Public
Schools and Tim Baker*

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of filing to the following counsel of record:

J. Andrew Hirth
28 N. Eighth Street
Suite 500
Columbia, MO 65201
Andy@TGHLitigation.com

Attorney for Plaintiff

/s/ Natalie Hoernschemeyer



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eFiling Confirmation Number: EF17993822

The following information and documents were submitted with this filing.

Filer Reference Number: None entered by filer

No filing fee or payment information on this filing.

Case

Court Case Number: 19BA-CV03467

Court Case Description: L. G. V COLUMBIA PUBLIC SCHOOLS ET AL

Other Tort filed in Boone County - Circuit Court

Notes to Clerk: None entered by filer

Document

Filing - Other/Miscellaneous - Entry of Appearance

Entry of Appearance

Attachments

Electronic Filing Certificate of Service

Filed on behalf of: TIM BAKER ; COLUMBIA PUBLIC SCHOOL DISTRICT

eService

Party

JOHN ANDREW HIRTH, Attorney for
Other Party

Service E-mail Address

andy@tghlitigation.com

EFILINGMENU

**IN THE CIRCUIT COURT OF BOONE COUNTY
THIRTEENTH JUDICIAL CIRCUIT
STATE OF MISSOURI**

L.G., through her parent and Next Friend, M.G.)

Plaintiff,)

v.)

Case No. 19BA-CV03467

COLUMBIA PUBLIC SCHOOLS,)

**TIM BAKER, individually, and as Assistant
Principal of Rock Bridge High School,**)

CITY OF COLUMBIA, MISSOURI,)

**KEISHA EDWARDS, individually, and as
a police resource officer at Rock Bridge
High School,**)

and)

**JOHN DOES I and II, individually, and as
Police Officers for the City of Columbia**)

Defendants.)

ENTRY OF APPEARANCE

COMES NOW Anne R. Kerns of the law firm of Mickes O'Toole, LLC, and hereby enters her appearance on behalf of Defendants Columbia Public Schools and Tim Baker in the above-referenced case.

Respectfully submitted,

MICKES O'TOOLE, LLC

By: /s/ Anne R. Kerns

Anne R. Kerns, MBE #60014

akerns@mickesotoole.com

12444 Powerscourt Drive, Suite 400

St. Louis, Missouri 63131

Telephone: 314-878-5600

Facsimile: 314-878-5607

*Attorney for Defendants Columbia Public
Schools and Tim Baker*

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of filing to the following counsel of record:

J. Andrew Hirth
28 N. Eighth Street
Suite 500
Columbia, MO 65201
Andy@TGHLitigation.com

Attorney for Plaintiff

/s/ Anne R. Kerns



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eFiling Confirmation Number: EF17993854

The following information and documents were submitted with this filing.

Filer Reference Number: None entered by filer

No filing fee or payment information on this filing.

Case

Court Case Number: 19BA-CV03467

Court Case Description: L. G. V COLUMBIA PUBLIC SCHOOLS ET AL

Other Tort filed in Boone County - Circuit Court

Notes to Clerk: None entered by filer

Document

Filing - Other/Miscellaneous - Entry of Appearance

Entry of Appearance

Attachments

Electronic Filing Certificate of Service

Filed on behalf of: TIM BAKER ; COLUMBIA PUBLIC SCHOOL DISTRICT

eService

Party

JOHN ANDREW HIRTH, Attorney for
Other Party

Service E-mail Address

andy@tghlitigation.com

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